

Tracy Sebesta

From: Josh Redelman
Sent: Monday, June 27, 2022 5:27 PM
To: Momanaee, Audrey F.; Stuart Lapp
Cc: Bret Davis; Tracy Sebesta
Subject: RE: NOV v. Garza (2151.013)
Attachments: Proposed Search Terms.docx

Audrey,

Please see the proposed search terms attached to this email.

Respectfully,

Josh Redelman

Attorney at Law

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From: Momanaee, Audrey F. <amomanaee@balch.com>
Sent: Monday, June 27, 2022 3:57 PM
To: Stuart Lapp <slapp@stibbsco.com>
Cc: Josh Redelman <jredelman@stibbsco.com>; Bret Davis <bdavis@stibbsco.com>; Tracy Sebesta <tsebesta@stibbsco.com>
Subject: RE: NOV v. Garza (2151.013)

Stuart,

Thanks for this and your call back. I've called you back a moment ago. Give me a call as you can, as we would still like to try to work out an agreement before Wednesday, but time is growing short.

Have you sent over a list of proposed search terms/file names as we discussed on Friday? I want to make sure that I haven't missed it.

Thanks,

Audrey



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From: Stuart Lapp <slapp@stibbsco.com>
Sent: Monday, June 27, 2022 1:23 PM
To: Momanaee, Audrey F. <amomanaee@balch.com>
Cc: Josh Redelman <jredelman@stibbsco.com>; Bret Davis <bdavis@stibbsco.com>; Tracy Sebesta <tsebesta@stibbsco.com>
Subject: NOV v. Garza (2151.013)

[External Email] Please use caution.

Audrey:

I left you a voice message and am sending the attached redline of your proposed forensic protocol. We are meeting with the client this afternoon.

Thanks,
Stuart

Stuart W. Lapp
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"KiloNewton, KN or kn or kN, KiloNewton LLC, @kilonewtonllc.com" "Williamson" "John Williamson"
"Dr. Simma, "Krishna"

"CPP, CPP Inc. @cppwind.com

Underwriters Laboratory, UL, @ul.com

Intertek, @intertek.com,

"lumped sum model" "lumped sum parameter model" "parameter" "LSM" "LSM calculator"

"HALT" "HALT test" "highly accelerated life-cycle testing"

"1P tracker" "2P tracker" "AmberTrack" "Corosolar" "Sunlink" "central drive" "purlins" "damper"
"damping" "modal analysis" "novatrack"

"wind load" "wind tunnel" "wind testing" "dynamic amplification factor" "DAF" "15595" "1857339-CAL"
"ANSYS or Ansys" "RSA or Robot Structural Analysis" "SOL-28-21305" "14390" "CPP Project"

NOV, NOV Solar Tracker, NOV tracker, Amber, NOV, NOV Rig Technologies, National Oilwell Varco,
@nov.com

Array, Array Technology, Array Technologies, Array Technologies, Inc. @arraytechinc.com

"CFD" " "balance of system or balance of system costs," "1P or 1IP or one in portrait", "2P or 2IP or two
in portrait," "solar array," "solar tracking," "solar racking or racking," "tracker or tracker study," "bloom,"
"butterfly," "prototype," "STC or Springett Technology Center," "geopro," "geo" "techtrack," "TT"
"confidential," "secret," "proprietary," "modify or change," and "weight or weights."